

**MEMO ENDORSED**

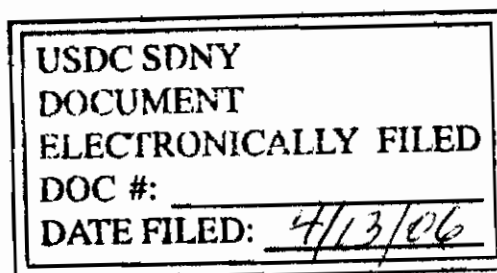
MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JEFFREY A. DOUGHERTY
Special Assistant Corporation Counsel
jdougher@law.nyc.gov
212-788-8342
212-788-9776 (fax)

BY FACSIMILE

Honorable James C. Francis IV
United States Magistrate Judge
United States Courthouse
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007



April 12, 2006

Re: Concepcion v. City of New York, et al. 05-CV-8501 (KMK) (JCF)

Dear Judge Francis:

I write to request an enlargement of time for Defendants to respond to Plaintiff's motion to compel production of documents. Defendants respectfully request permission to file responsive papers on or before April 19, 2006. Defendants' initial response was due on or before April 14, 2006. Currently, Defendants are drafting other discovery motions and preparing their witnesses for the pending consolidated witness depositions. Defendants seek this enlargement so that they can properly prepare their response.

Plaintiff's counsel is unavailable to offer their consent because Ms. Wohlforth is on vacation and Defendants have been unable to reach Ms. Stewart.¹ However, Defendants respectfully submit this brief extension will not prejudice Plaintiff because Ms. Wohlforth (who upon information and belief is briefing this motion) is not returning to her office until Monday, April 24, 2006. For the foregoing reasons, Defendants respectfully request that they be permitted to submit their response papers on or before April 19, 2006.

Respectfully submitted,

Jeffrey A. Dougherty

cc: All Counsel of Record (by Facsimile)

¹ The Court's March 3, 2006 memo endorsed order regarding the briefing schedule for this motion reflects that Ms. Wohlforth "will be away on vacation the first three weeks of April."

4/13/06
Application granted.
SO ORDERED.
James C. Francis IV
USMJ